

January 9, 2023

The Honorable Analisa Torres
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov
Via e-mail and pro se electronic filing

Re: Goodman v. Bouzy, et al., Case No. 1:21-cv-10878-AT-JLC

Dear Judge Torres,

Pursuant to your individual rules of practice I(C), I write to respectfully request leave for an extension of time for the filing of my Amended Complaint. Pursuant to your memo endorsement of ECF No. 88, I have been diligently preparing an Amended Complaint. The initial extension was sought because of the untimely manner Defendants chose to enter this case and other factors which caused multiple filing deadlines to fall on the same day. I have timely filed the response in opposition to the motion to set aside the default as ordered (ECF No. 91). Defendants were separately ordered to respond to the Motion for Rule 11 Sanctions. They did so on January 6, 2023 (ECF No. 94). Defendants' response was replete with false statements and false light misrepresentations which required a reply. I filed that on January 8, 2020 and the filing was entered on the docket today, January 9, 2023 (ECF No. 96).

Defendants' response in opposition to the Motion for Rule 11 sanctions was longer than anticipated and contained excessive superfluous and false information. The time required to complete the necessary response conflicted with the time required to complete the Amended Complaint. Furthermore, additional outside interference from vexatious non-party David George Sweigert, including agitation in this and other cases I am involved in, has distracted from the time required to amend the complaint.

Lastly, an aging family member will be undergoing planned surgery on January 12, 2023 and long planned travel must take place on January 10. This will occupy my time throughout most of the day. Prior to Defendants' January 6 response, I had anticipated filing the Amended Complaint one day earlier than ordered, however as the end of the day nears, I grow increasingly concerned about the level of completeness of the Amended Complaint at the present moment.


I respectfully request a second extension of time to file this Amended Complaint. There has been one previous request for an extension of time, but that failed to specify a desired date and the original extension granted only an additional seven days.

This second extension is being requested so I may provide the Court with the most complete and thoroughly prepared Amended Complaint I am able, and also in the interest of judicial efficiency to avoid a future motion to further amend. An additional seven days will be adequate, and no further amendments are presently anticipated.

No parties would be prejudiced by the extension of time and the specific adversaries are currently non-parties so there is no adversary to provide or deny consent. The deadline to file is less than 48 hours from the time of this request, and a filing will be submitted if this request goes unanswered, however that filing would be followed by a motion seeking leave for additional amendment.

I respectfully request leave from Your Honors individual rules and an order granting an extension of time to file the Amended Complaint on or before January 17, 2023.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Goodman', with a stylized flourish at the end.

Jason Goodman